



County of San Diego

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CEQA Initial Study - Environmental Checklist Form (Based on the State CEQA Guidelines, Appendix G)

1. Proposed Project Title:
Integrated Vector Management Program
2. Lead agency name and address:
County of San Diego, Department of Environmental Health
Vector Control Program
5570 Overland Avenue, Suite 102
San Diego, CA 92123
3.
 - a. Contact: KariLyn Merlos, Program Coordinator
 - b. Phone number: (858) 495-5799
 - c. E-mail: KariLyn.Merlos@sdcounty.ca.gov
4. Project location:
The Integrated Vector Management Program (IVMP) (Proposed Project) includes vector and vector-borne disease surveillance and control services throughout all 18 incorporated cities and the unincorporated areas of San Diego County totaling approximately 4,261 square miles (Figure 1). As a program within the County Department of Environmental Health (DEH), the Vector Control Program (VCP) is responsible for implementing the IVMP, which encompasses the VCP's existing service area.
5. Project Applicant name and address: *see Lead Agency*
6. General Plan

Community Plan:	Countywide
Land Use Designation:	N/A
Density:	N/A
Floor Area Ratio (FAR):	N/A
7. Zoning

Use Regulation:	N/A
Minimum Lot Size:	N/A
Special Area Regulation:	N/A

8. Description of project:

The VCP has been reducing and controlling mosquitoes and other vectors, and protecting the county against vector-borne diseases for over 40 years. For the purposes of the California Environmental Quality Act (CEQA) analysis, a vector is defined as an organism that is capable of spreading disease to humans or presents a public nuisance by negatively impacting farm and other outdoor workers, outdoor recreation and tourism industries, real estate values, or the public in general. Vectors may include mosquitoes, ticks, fleas, rodents, and eye gnats. In 1989, the County of San Diego (County) Board of Supervisors (Board) assumed the powers of a Vector Control District, which is staffed by the DEH.

Since 1989, the VCP has continued to reduce the potential for the spread of diseases and the impact that vectors have on property through ongoing educational outreach, surveillance activities, source reduction (i.e., physical control), and source treatment (i.e., biological and chemical control). The VCP's five core services include (1) early detection of public health threats through comprehensive vector surveillance and testing; (2) control and reduction of vectors that transmit diseases to humans; (3) disseminating vector-borne disease information to provide county residents and property owners with tools for prevention, protection, and reporting of vectors that transmit diseases; (4) appropriate and timely response to vector-related customer complaints; and (5) detection of vector-borne pathogens.

As identified in County Code of Regulatory Ordinances Section 64.201 and the California Health and Safety Code Sections 2001 et. seq, a board of supervisors is allowed under Government Code Section 25842.5 to provide the same services and exercise the powers of a mosquito abatement and vector control district. Pursuant to this statutory authority, the Board resolved to act as a mosquito abatement and vector control district in both the incorporated cities and the unincorporated areas of the county. The city council of each incorporated city in San Diego County consented to the Board's resolution. The Board also resolved to delegate implementation and enforcement duties to the DEH. By Government Code section 25842.5 and County Code of Regulatory Ordinances Sections 64.201 through 64.206, the VCP is authorized to order responsible persons to control and abate disease-transmitting¹ vectors and eye gnats in San Diego County. The VCP is also authorized by Government Code Section 25842.5 to directly control and abate mosquitoes and other disease-transmitting and nuisance vectors and to recover its costs to do so, in order to protect the public health, safety and welfare of the entire San Diego County community from vector-borne diseases and vector-related public nuisances.

The VCP protects the public from vector-borne disease and nuisance while protecting the environment through a coordinated set of activities collectively known as the IVMP. These activities and services are described in the annual Engineer's Report, which provides an overview of the VCP's general practices and procedures. As the Proposed Project, the IVMP would continue to operate using a comprehensive approach by applying various techniques, including surveillance, source reduction (i.e., physical control), source treatment (i.e., biological and chemical control), public education, and outreach. Each of these techniques could be applied to the applicable vectors under the IVMP, including:

- Disease-transmitting mosquitoes (i.e., *Culex* spp. and *Aedes* spp.);
- Nuisance mosquitoes (not disease-transmitting);
- Vectors associated with mammal disease and transmission (i.e., ticks and rodents);

¹ "Disease-transmitting vector" means "an animal capable of transmitting the causative agent of human disease." See, County Code Section 64.202(h).

- Other nuisance species (e.g., eye gnats and flies) deemed necessary for control as approved by VCP officials.

Where applicable, the Proposed Project incorporates various vector management principles and techniques from guidance documents, such as the VCP's annual *Engineer's Report*, *West Nile Virus Strategic Response Plan*, and *Invasive Aedes Mosquito Strategic Response Plan*. These guidance documents are attached to this Initial Study.

The Proposed Project will also allow for inclusion of progressive and emerging vector control activities and materials. VCP staff is in communication with other regional vector control districts as well as State and Federal agencies to identify new vector-borne diseases and outbreaks, and to share eradication techniques. New vector control methods based on scientific evidence and expert guidance may be implemented to address public risks as they arise. These emerging vector control strategies could include increased or advanced/early source prevention, reduction, surveillance, and/or physical/biological/chemical control, depending on the assessment of public health risk or nuisance level.

Specifically, the IVMP would include the following activities that will be evaluated for potential environmental impacts in the Program Environmental Impact Report (PEIR):

Surveillance

The VCP currently monitors over 1,400 mosquito-breeding sources throughout San Diego County, including such techniques as counting and testing mosquito batches (i.e., trapping), testing dead birds, monitoring/testing sentinel chickens, and conducting aerial reconnaissance to identify sources. Surveillance is also conducted for ticks (for tularemia or Lyme disease), and rodents (for plague or hantavirus). Also, routine and complaint-based inspections are conducted to assure the prevention and abatement of flies associated with commercial poultry ranches. Lastly, as part of the VCP's surveillance technology, the Vector Disease and Diagnostics Laboratory was added in July 2010, allowing in-house scientists use state-of-the-art molecular tests to detect vector-borne pathogens in a wide variety of samples ranging from mosquitoes and ticks, to birds, rodents and other animals.

Source Reduction (i.e., Physical Control)

The VCP directs and assists property owners to manage vectors on their property to reduce both attractants and breeding sources. To reduce mosquito production, physical control method primarily targets mosquitoes in their larval stage. This may include the removal of vegetation or sediment, interruption of water flow, rotation of stored water, pumping and/or filling sources, improving drainage and water circulation systems, and installing, improving, or removing culverts, tide gates, and other water control structures in wetlands. VCP staff direct property owners to coordinate water management efforts under the guidance of federal and state regulatory agencies.

Source Treatment (i.e., Biological and Chemical Control)

Biological Control

Mosquito fish, *Gambusia affinis*, are one of the VCP's primary biological control agents used against mosquitoes. Mosquito fish are not native to California, but have been widely established in the state since the early 1920s and now inhabit most natural and constructed water bodies. Mosquito fish are made available to property owners to control mosquito production only in artificial containers such as ornamental fishponds, water plant barrels, horse troughs, and neglected green swimming pools.

The VCP also uses natural biological larvicides registered by the Federal Environmental Protection Agency, California Environmental Protection Agency, and other environmental agencies to control mosquito populations.

Chemical Control

Many mosquito-breeding sources cannot be entirely managed with physical or biological control measures, so the use of chemical applications may be required, which may include but is not limited to pesticides (such as insecticides) and herbicides. Specifically, chemical controls that eradicate or target mosquito eggs (or larvae) are referred to as larvicide, while adulticide is referenced when treating adult mosquitoes; both of which are forms of pesticides. Chemical controls can be applied in a variety of methods including manual (back-pack) hand-operated devices, truck-mounted applicators, or other motorized vehicles (e.g., aircraft, watercraft) to access remote locations. Regarding rodents, although the VCP retains the ability to use chemical controls, it primarily offers advice and assists property owners with their control efforts by providing inspections and consultations, as well as educational information for control measures focusing on exclusion and elimination.

Public Education and Outreach

Health education, outreach, and raising awareness about vectors are all integral parts of the IVMP. A proactive approach is used to educate people within the County about the risks of vectors and preventive measures they can take to protect themselves and their communities. To achieve this goal, VCP staff distributes educational materials such as brochures, pamphlets, bookmarks, and tip cards in multiple languages. Social media is used to notify the public of press releases and scheduled aerial larvicide treatments. The education campaign emphasizes prevention, protection, reporting, and behavior change. A similar proactive approach is used for educating the public about diseases transmitted by rats, ticks, mice, and fleas. Educational presentations, tabletop displays, and pamphlets are used and distributed to local communities.

It should be noted that the Board also adopted a Countywide Eye Gnat Program on December 5, 2012 (03) and associated Negative Declaration (Environmental Review No. 12-00-001) dated October 31, 2012. Therefore, the program is incorporated by reference into the Proposed Project but will not be included in the PEIR analysis since it was previously approved by the Board. In addition, on March 24, 2010 (04) the Board certified a Program EIR for the Vector Habitat Remediation Program, which has offered competitive and direct grants to private and public organizations with the goal of implementing long-term solutions to eliminate or reduce mosquito-breeding habitat.

9. Surrounding land uses and setting:

The IVMP applies to all 18 incorporated cities and the unincorporated areas of San Diego County. San Diego County is bounded by Orange and Riverside counties to the north, Imperial County to the east, Pacific Ocean to the west, and the United States/Mexico International Border to the south.

10. Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):

<u>Permit Type/Action</u>	<u>Agency</u>
Cooperative Agreement for Pesticide-related Requirements	California Department of Public Health
NPDES Order No. 2016-0039-DWQ for Vector Control (previously No. 2011-0002-DWQ)	State Water Resources Control Board
<u>General Note:</u> during implementation of individual IVMP activities, entry onto public or private lands will be necessary to conduct vector control activities. Coordination with applicable responsible parties will be conducted on an as-needed basis.	

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

YES

☐

NO

☒

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Because the IVMP would be implemented countywide, all Native American tribes will be notified within San Diego County (who previously requested notification) regarding the proposed IVMP during the Initial Study/Notice of Preparation comment period. However, consultation has not begun, and it is anticipated to occur during preparation of the draft PEIR.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project and involve at least one impact that is a "Potentially Significant Impact" or a "Less Than Significant With Mitigation Incorporated," as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Geology & Soils |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Hydrology & Water Quality |
| <input type="checkbox"/> Land Use & Planning | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population & Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation/Traffic | <input checked="" type="checkbox"/> Tribal Cultural Resources | <input type="checkbox"/> Utilities & Service Systems |
| <input checked="" type="checkbox"/> Mandatory Findings of Significance | | |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ On the basis of this Initial Study, the Department of Environmental Health finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ On the basis of this Initial Study, the Department of Environmental Health finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ On the basis of this Initial Study, the Department of Environmental Health finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.



Signature

8/23/18

Date

KariLyn Merlos
Printed Name

Program Coordinator
Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

I. AESTHETICS -- Would the project:

a) Have a substantial adverse effect on a scenic vista?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

A vista is a view from a particular location or composite views along a roadway or trail. Scenic vistas often refer to views of natural lands, but may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups. The items that can be seen within a vista are visual resources. Adverse impacts to individual visual resources or the addition of structures or developed areas may or may not adversely affect the vista. Determining the level of impact to a scenic vista requires analyzing the changes to the vista as a whole and to individual visual resources.

Less than Significant Impact: The Proposed Project includes implementation of the countywide Integrated Vector Management Program (IVMP). As such, individual activities could occur in a wide range of locations within San Diego County, and may be located near, within, or visible from a scenic vista. However, the proposed IVMP does not include the construction of new structures or facilities. Furthermore, none of the proposed features of the IVMP would substantially physically modify existing structures or visual features of the landscape. Therefore, the proposed IVMP would not substantially change the composition of an existing scenic vista in a way that would adversely alter the visual quality or character of the view, and the Proposed Project would have a less than significant adverse effect on a scenic vista.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

State scenic highways refer to those highways that are officially designated by the California Department of Transportation as scenic ([California Scenic Highway Program](#)). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

Less than Significant Impact: While it is possible that future vector control activities have the potential to occur near one of the County's officially designated State scenic highways (State Routes 52, 75, 78, 125, and 163)², the proposed IVMP activities are intended to reduce the spread of mosquito-borne and other vector-borne disease. The proposed IVMP includes surveillance and public education of vector threats as well as physical, biological, and chemical control methods. It is not expected to result in removal or damage of these highways other scenic resources such as

² <http://www.dot.ca.gov/design/lap/livability/scenic-highways/2017-03DesignandEligible.xlsx> (Updated March 2017)

trees, rock outcroppings, or historic buildings. Therefore, impacts to scenic resources within a State scenic highway system will be less than significant.

- c) Substantially degrade the existing visual character or quality of the site and its surroundings?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The proposed IVMP would include surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne disease. This would also include public outreach and education in communities across San Diego County. As a result of the various implementation methods, grading or dredging activities may occur; however, no substantial earthwork would be proposed that would significantly alter the visual character of a site. Also, no major structures would be proposed that would be incompatible or substantially degrade the existing visual character.

Specifically, physical control activities may include restricting the size of onsite native and nonnative vegetation. Where dense vegetation is present, certain activities may potentially alter the visual character of the site by reducing the vegetation present. However, such activities would not result in a landscape that would be incompatible or substantially degrade the existing visual character.

- d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The Proposed Project does not propose any use of outdoor lighting or building materials with highly reflective properties such as highly reflective glass or high-gloss surface colors. Therefore, the Proposed Project will not create any new sources of light pollution that could contribute to skyglow, light trespass, or glare that would adversely affect day or nighttime views in the area.

II. AGRICULTURE AND FORESTRY RESOURCES -- Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed IVMP would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne disease. Because these activities would occur across the entire county, there is potential for the IVMP and its associated activities to be located on farmland pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. However, the proposed activities would not result in a change in land use of these sites, and they would not result in the conversion of agricultural lands to a non-agricultural use. Therefore, no impacts are anticipated to occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The Proposed Project includes implementation of the countywide IVMP with the intent to reduce the spread of mosquito-borne and other vector-borne diseases and nuisance vectors. The activities would not install new uses that would conflict with the existing zoning of a site, including any sites designated as agriculture or under a Williamson Act contract. Therefore, no impacts are anticipated to occur to agriculture zoned areas or lands under Williamson Act contract.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), or timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Because these activities would occur across the entire county, there is potential for the IVMP and its associated activities to be located within forest land or timberland. However, the Proposed Project would be consistent with existing zoning because it would not propose a rezone of property. San Diego County does not contain any existing Timberland Production Zones. Therefore, implementation of the Proposed Project would not conflict with existing zoning for or cause the rezoning of forest land, timberland, or Timberland Production Zones.

d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Because these activities would occur across the entire county, there is potential for the IVMP and its associated activities to be located within forest land as defined in Public Resources Code Section 12220(g). However, the intent of the proposed IVMP is to reduce the spread of

mosquito-borne and other vector-borne disease. Implementation of IVMP would not result in the disturbance, loss or conversion of forest land resources to a non-forest use. Therefore, the Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use.

- e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: While the proposed IVMP would include surveillance and physical, biological, and chemical control methods, this would not result in any land use conversions. The proposed IVMP is not expected to introduce a change to the existing environment which could ultimately result in the conversion of land use. Therefore, no Important Farmland, or other agricultural resources will be converted to a non-agricultural use. As such, no impacts would result.

III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

- a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The San Diego RAQS is based on population and vehicle trends as well as land use plans developed by the cities and the County as part of the development of their general plans. As such, projects that propose development consistent with the growth anticipated by the general plans and San Diego Association of Governments (SANDAG) growth forecasts would be consistent with the RAQS and SIP. The IVMP would not generate growth, increase population, or require the alteration of an existing land use designation through amendments to general plans or changes to zoning. The proposed IVMP includes surveillance and public education of vector threats as well as physical, biological, and chemical control methods. Therefore, the Proposed Project is not anticipated to conflict with the applicable land use plans nor conflict with or obstruct the implementation of the RAQS or applicable portions of the SIP. Impacts are anticipated to be less than significant; however, this will be further addressed in the PEIR.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

In general, air quality impacts are the result of emissions from motor vehicles, and from short-term construction activities. The San Diego County Land Use Environment Group has established guidelines for determining significance which incorporate the Air Pollution Control District's (SDAPCD) established screening-level criteria for all new source review in SDAPCD Rule 20.2. These screening-level criteria can be used as numeric methods to demonstrate that a project's total emissions (e.g. stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. Since SDAPCD does not have screening-level criteria for emissions of volatile organic compounds (VOCs), the use of the screening level for reactive organic compounds from the South Coast Air Quality Management District for the Coachella Valley (which are more appropriate for the San Diego Air Basin) are used.

Potentially Significant Impact: The proposed IVMP would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisance vectors. This would also include public outreach and education in communities across San Diego County. As a result, air quality emissions are anticipated to occur. This will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

San Diego County is presently in non-attainment for the 1-hour concentrations under the California Ambient Air Quality Standard for ozone (O₃). San Diego County is also presently in non-attainment for the annual geometric mean and for the 24-hour concentrations of particulate matter less than or equal to 10 microns (PM₁₀) under the California Ambient Air Quality Standard. O₃ is formed when VOCs and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM₁₀ in both urban and rural areas include motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Potentially Significant Impact: The proposed IVMP would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne disease. This would also include public outreach and education in communities across San Diego County. As a

result, the IVMP has the potential to result in an increase of criteria pollutants (O_3 and PM_{10}) for which San Diego County is in non-attainment. This will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

d) Expose sensitive receptors to substantial pollutant concentrations?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Air quality regulators typically define sensitive receptors as schools (Preschool–12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County also considers residences as sensitive receptors since they house children and the elderly.

Less than Significant Impact: The Proposed Project includes implementation of the countywide IVMP in which individual activities would occur throughout San Diego County. This could potentially include activities near sensitive receptors since mosquito control and other vector control methods are needed to protect the public health and to reduce the spread of vector-borne diseases and nuisance vectors. The proposed mosquito and other vector control activities would not include construction of new stationary sources of air emissions. Specifically, surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods would be temporary and sporadic in nature depending on the location of an identified vector threat. Activities are also intended to occur over a wide geographic area. Furthermore, any application of chemical controls would be conducted in full compliance with legal application rates as regulated by the California Department of Pesticide Regulation. Therefore, while individual sites would be targeted for vector remediation, the proposed IVMP is not anticipated to result in the exposure of sensitive receptors to substantial pollutant concentrations and would not place sensitive receptors near said emission sources carbon monoxide hotspots.

e) Create objectionable odors affecting a substantial number of people?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The proposed IVMP includes surveillance and public education of vector threats as well as physical, biological, and chemical control methods. Chemical control activities are the only component that could potentially create objectionable odors. Although all chemicals, including pesticide, larvicide, and adulticide are applied in accordance with label requirements and legal application rates, various compounds found within these chemicals could emit odors when they evaporate into the air resulting in airborne particles and vapors. Therefore, an application containing an odorous compound could potentially impact people for a period of time. However, spraying (or applying) chemical controls would be temporary and sporadic depending on the location of an identified vector risk. Therefore, while the proposed IVMP has the potential to result in odors, they are anticipated to be confined and localized to a specific area for a short period of time, and are not anticipated to affect a substantial number of people. As such, impacts from objectionable odors would be less than significant.

IV. BIOLOGICAL RESOURCES -- Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Proposed Project includes implementation of the countywide IVMP in which individual activities would occur throughout San Diego County. It would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. As a result, the IVMP has the potential to result in adverse effects, either directly or through habitat modifications, to special status species. This will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Proposed Project includes implementation of the countywide IVMP in which individual activities would occur throughout San Diego County. It would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. This could potentially include, but not be limited to, removal of vegetation or sediment, interruption of water flow, rotation of stored water, pumping and/or filling sources, improving drainage and water circulation systems, and installing, removing, or improving culverts, tide gates, and other water control structures. As a result, the IVMP has the potential to result in adverse effects on riparian habitat or other sensitive natural communities. However, any potential impacts to riparian habitat or other sensitive natural communities would be avoided or minimized to the extent feasible, and would be permitted and mitigated in accordance with applicable federal, state, and local requirements. This will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

As of November 2011, pesticides applied to Waters of the U.S. for vector control purposes must be conducted in accordance with the Statewide National Pollutant Discharge Elimination System (NPDES) Permit for *Biological and Residual Pesticide Discharges to Waters of the U.S. from Vector Control Applications*. At that time the VCP received a Notice of Authorization from the State Water Resources Control Board (SWRCB) to operate under this general permit. In 2014, the SWRCB amended the permit (2014-0106-DWQ) which: (1) added all larvicides and adulticides that are currently registered by Department of Pesticide Regulations (DPR) using the same active ingredients; (2) included additional receiving water limitations and receiving water monitoring

triggers for newly added active ingredients; and (3) included a provision for reopening the permit to include new active ingredients that DPR registers for vector control. Most recently, the SWRCB reissued the general permit (2016-0039-DWQ), which became effective on July 1, 2016. The updated permit includes the addition of minimum risk pesticides which are pesticides exempted from Federal Insecticide, Fungicide, and Rodenticide Act requirements when used only in the manner specified by federal regulations. The VCP remains an authorized enrollee under the current permit.

- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Proposed Project includes implementation of the countywide IVMP in which individual activities would occur throughout San Diego County. It would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. As a result, the IVMP has the potential to result in adverse effects on federally protected wetlands. This will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

As discussed above in response to Biological Resources – IV(b), the VCP is a current enrollee of the SWRCB NPDES Permit 2016-0039-DWQ, which authorizes vector control application in Waters of the U.S.

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The proposed IVMP would target identified vector threats and apply various control methods to protect the public from vector-borne disease and nuisances. The Proposed Project is not intended to interfere with the movement of any native resident or migratory fish or wildlife species. However, habitat supporting said species could potentially result in interference with wildlife movement. This will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

- e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Proposed Project includes implementation of the countywide IVMP in which individual activities would occur throughout San Diego County. It would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. Implementation of the IVMP could potentially result in conflicts with Habitat Conservation Plans, Natural Communities Conservation Plan or other approved local, regional or state habitat conservation plan. This potential conflict with habitat conservation plans will be further discussed in the PEIR.

V. CULTURAL RESOURCES -- Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed IVMP would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. This would also include public outreach and education in communities across San Diego County. Physical control activities are the only components that may involve minor grading or vegetation management in order to survey and abate vectors and nuisances. Implementation of the IVMP would not include development or construction of new structures or facilities that would result in the disturbance or alteration of existing historical resources or structures. Therefore, no impacts to historical resources would occur.

- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Among other activities, the proposed IVMP may include physical control methods for the purpose of monitoring and abatement to improve water circulation in aquatic habitats. This could potentially include, but not be limited to, removal of vegetation or sediment, interruption of water flow, rotation of stored water, pumping and/or filling sources, improving drainage and water circulation systems, and installing, removing, or improving culverts, tide gates, and other water control structures. As a result, these activities may have the potential to result in an adverse change in the significance of an archeological resource. However, any potential impacts to archeological resources would be avoided or minimized to the extent feasible, and would be mitigated in accordance with applicable federal, state, and local requirements. This will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

c) Directly or indirectly destroy a unique geologic feature?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

San Diego County has a variety of geologic environments and geologic processes which generally occur in other parts of the state, country, and the world. However, some features stand out as being unique in one way or another within the boundaries of the County.

Potentially Significant Impact: As discussed above in response to V(b), physical control activities proposed under the IVMP could potentially involve grading or earthwork-related activities. As a result, the Proposed Project has the potential to directly or indirectly destroy a unique geologic feature. Therefore, impacts to unique geologic features will be further discussed in the PEIR.

d) Directly or indirectly destroy a unique paleontological resource or site?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: As discussed above in response to V(b), physical control activities proposed under the IVMP could potentially involve grading or earthwork-related activities. As a result, the Proposed Project has the potential to result in a direct or indirect impact to a unique paleontological resource. Therefore, impacts to unique paleontological resources will be further discussed in the PEIR.

e) Disturb any human remains, including those interred outside of dedicated cemeteries?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: As discussed above in response to V(b), physical control activities proposed under the IVMP could potentially involve grading or earthwork-related activities. As a result, the Proposed Project has the potential to disturb human remains, including those interred outside of formal cemeteries. Therefore, this will be further discussed in the PEIR.

If implementation of the IVMP resulted in the discovery of human remains, the County Coroner would be contacted and appropriate measures implemented, consistent with State Health and Safety Code Section 7050.5, which prohibits unauthorized disinterring, disturbing, or removing of human remains from any location.

VI. GEOLOGY AND SOILS -- Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The Proposed Project includes implementation of the countywide IVMP. As such, individual activities could occur in a wide range of locations and may be located near or within fault rupture hazard zones. However, the proposed IVMP would not involve the construction of habitable buildings or structures. Rather, the IVMP would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods. This would also include public outreach and education in communities across San Diego County. Therefore, the IVMP will not expose people or structures to the risk of loss, injury, or death involving a known fault-rupture hazard zone.

- ii. Strong seismic ground shaking?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed IVMP would target identified vector threats and apply various control methods to protect the public from vector-borne disease and nuisances, and it would not propose habitable buildings or structures. Therefore, the IVMP will not expose people or structures to the risk of loss, injury, or death involving strong seismic ground shaking.

- iii. Seismic-related ground failure, including liquefaction?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The Proposed Project includes implementation of the countywide IVMP. Individual activities could occur in a wide range of locations and may be located near or within potential liquefaction areas. However, the proposed IVMP would not involve the construction of habitable buildings or structures. Therefore, the IVMP will not expose people or structures to the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.

- iv. Landslides?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The Proposed Project includes implementation of the countywide IVMP. Individual activities could occur in a wide range of locations and may be located near or within landslide susceptibility areas. However, the proposed IVMP would not involve the construction of habitable buildings or structures. Therefore, the IVMP will not expose people or structures to the risk of loss, injury, or death involving landslides.

b) Result in substantial soil erosion or the loss of topsoil?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Among other activities, the proposed IVMP would include physical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. As a result, minor grading activities could potentially occur resulting in soil erosion and/or the loss of topsoil. In order to minimize the potential for soil erosion, activities will consider implementation of Best Management Practices, if applicable. Therefore, the potential for IVMP activities to result in soil erosion and the loss of topsoil will be further discussed in the PEIR.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The Proposed Project includes implementation of the countywide IVMP. Individual activities could occur in a wide range of locations and may be located on a geologic unit or soil that is unstable. While it is possible that IVMP activities may include physical control methods such as minor grading or vegetation management, the proposed IVMP is intended to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances, and is not anticipated to include significant earthwork or other activities that would result in an unstable geologic unit or soil. For further information regarding landslides, liquefaction, and lateral spreading, refer to *VI. Geology and Soils, Question a., iii-iv* listed above. As such, impacts are expected to be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The Proposed Project includes implementation of the countywide IVMP. Individual activities could occur in a wide range of locations and may be located on expansive soils. However, the proposed IVMP is intended to reduce the spread of mosquito-borne

and other vector-borne diseases and nuisances, and is not anticipated to include installation of structures or other facilities that would create substantial risks to life or property. Therefore, impacts are anticipated to be less than significant.

- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed IVMP would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. This would also include public outreach and education in communities across San Diego County. Activities would not include installation of any septic tanks or alternative wastewater disposal systems; therefore, no impact would result due to implementation of the Proposed Project.

VII. GREENHOUSE GAS EMISSIONS -- Would the project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Greenhouse Gas (GHG) emissions result in an increase in Earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, and is known as global climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels.

GHGs include carbon dioxide, methane, halocarbons, and nitrous oxide, among others. Human induced GHG emissions are a result of energy production and consumption, and personal vehicle use, among other sources. A regional GHG inventory prepared for the San Diego Region³ identified on-road transportation (cars and trucks) as the largest contributor of GHG emissions in the region, accounting for 46% of the total regional emissions. Electricity and natural gas combustion were the second (25%) and third (9%) largest regional contributors, respectively, to regional GHG emissions.

Climate changes resulting from GHG emissions could produce an array of adverse environmental impacts including water supply shortages, severe drought, increased flooding, sea level rise, air pollution from increased formation of ground level O₃ and particulate matter, ecosystem changes,

³ San Diego County Greenhouse Gas Inventory: An Analysis of Regional Emissions and Strategies to Achieve AB 32 Targets. University of San Diego and the Energy Policy Initiatives Center, September 2008.

increased wildfire risk, agricultural impacts, ocean and terrestrial species impacts, among other adverse effects.

In 2006, the State passed the Global Warming Solutions Act of 2006, commonly referred to as Assembly Bill 32 (AB 32), which set the GHG emissions reduction goal for the State of California into law. In 2008, the California Air Resources Board (CARB) adopted the first iteration of the Climate Change Scoping Plan: A Framework for Change (Initial Scoping Plan), which identified the main strategies California would implement to achieve the GHG reductions necessary to reduce forecasted business-as-usual emissions in 2020 to the State's historic 1990 emissions level (CARB 2008). CARB approved the first update to the Initial Scoping Plan in May 2014 (2014 Scoping Plan Update).

In 2015, Executive Order B-30-15 directed the CARB to update the Scoping Plan to establish a mid-term GHG reduction target for California of 40 percent below 1990 levels by 2030. In November 2017, CARB released the 2017 Climate Change Scoping Plan Update, the Strategy for Achieving California's 2030 GHG Target (2017 Scoping Plan Update; CARB 2017). The 2017 Scoping Plan Update identifies state strategies for achieving the state's 2020 and 2030 GHG emissions reduction targets codified by the California Global Warming Solutions Act of 2006 (AB 32) and Senate Bill (SB 32), which amended and extended the California Global Warming Solutions Act of 2006 beyond 2020 to 2030.

Senate Bill 375 (SB 375), passed in 2008, links transportation and land use planning with global warming. It requires the CARB to set regional targets for the purpose of reducing GHG emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under CEQA. SANDAG has prepared a Sustainable Communities Strategy, which is a new element of the 2050 Regional Transportation Plan (RTP). The strategy identifies how regional GHG reduction targets, as established by the CARB, will be achieved through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be feasible.

It should be noted that an individual project's GHG emissions will generally not result in direct impacts under CEQA, as the climate change issue is global in nature, however an individual project could be found to contribute to a potentially significant cumulative impact. CEQA Guidelines Section 15130 states that an EIR shall discuss cumulative impacts of a proposed project when the project's incremental effect is cumulatively considerable.

On February 14, 2018, the County Board of Supervisors adopted the Climate Action Plan (CAP), which identifies specific strategies and measures to reduce GHG emissions in the largely rural, unincorporated areas of San Diego County as well as County government buildings and operations. The CAP updates and implements the County's 2011 General Plan Update goals, policies, and reduction measures to meet the State's GHG reduction targets including AB 32 (2020 goal) and SB 32 (2030 goal), and to demonstrate progress towards a 2050 GHG reduction goal (County 2018). The plan includes six chapters: (1) Introduction; (2) Greenhouse Gas Emissions Inventory, Projections, and Reductions Targets; (3) Greenhouse Gas Reduction Strategies and Measures; (4) Climate Change Vulnerability, Resiliency, and Adaptation; (5) Implementation and Monitoring; and (6) Public Outreach and Engagement.

Concurrent with adoption of the CAP, the County adopted new Guidelines for Determining Significance for Climate Change, which identifies that a proposed project would have a less than significant cumulatively considerable contribution to global climate change if it is consistent with the County's CAP. As defined in these Guidelines, consistency with the CAP is determined through the CAP Consistency Review Checklist (Checklist). The Checklist follows a two-step process to determine if projects are consistent with the CAP and whether they may have a significant

cumulative impact under the County's adopted GHG thresholds of significance. The Checklist further explains that if a project is consistent with the projections and land use assumptions in the 2011 General Plan Update and CAP, its associated growth in terms of GHG emissions would have been accounted for in the CAP's projections and project implementation of the CAP reduction measures will contribute towards reducing the County's emissions and meeting the County's reduction targets.

Potentially Significant Impact: The proposed IVMP includes a range of vector management activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. This would also include public outreach and education in communities across San Diego County. As a result, the IVMP would result in GHG emissions from various sources including on-road fleet vehicles, watercraft, aircraft, portable equipment (pumps, sprayers, generators), and small equipment (handheld sprayers, foggers, dusters). The dominant fuel used for these mobile sources is motor gasoline along with some diesel fuel (larger trucks), and jet fuel (turbine-powered aircraft).

As noted in the CAP Appendix B,

the County's vehicle fleet operated on gasoline, diesel, and compressed natural gas (CNG) fuels in 2014. This included both on-road and off-road vehicle fleet and equipment, such as construction equipment and airport ground support equipment... Fuel use and mileage by vehicle type was recorded into [the Climate Registry Information System (CRIS)] from County records and fuel-specific or vehicle-specific emission factors from [The Climate Registry (TCR)] were applied to estimate vehicle fleet emissions in 2014. CO₂ emission factors for all three fuel types are based on the volume of gasoline or diesel and the total energy content of purchased CNG fuel.

As cited above, the CAP accounted for the County's vehicle fleet usage, which includes the County's DEH fleet, as part of the baseline inventory of GHG emissions. The potential for the IVMP to result in GHG impacts on the environment will be further analyzed in the PEIR, but for the purpose of this Initial Study, impacts are considered potentially significant.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

☒ Potentially Significant Impact
☐ Less than Significant With Mitigation Incorporated

☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: As explained above in response to Greenhouse Gas Emissions - VII(a), the IVMP would result in GHG emissions from various sources as a result of implementation of physical, biological, and chemical controls as well as surveillance and public outreach to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. Therefore, the IVMP's potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

VIII. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably

foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Among other activities, the Proposed Project would include chemical control methods to reduce the spread of mosquito-borne and other vector-borne disease. This may include, but not be limited to, of insecticides, pesticides, and herbicides. Regarding mosquitoes, the frequency and extent of the chemical applications will vary depending on the type of species, mosquito abundance, water temperature, organic content, time of year, and other factors. In addition, phased risk levels have been established to identify when there is an elevated public health risk, and how the VCP would respond to each risk level (e.g., outreach, testing, treatment, etc.). The VCP strives to safeguard the public's health from West Nile Virus, Zika, and other diseases as well as to minimize harmful effects on the environment by using this risk-analysis approach to control the spread of such diseases. Public communication, education, and transparency of operations are the cornerstones of the VCP's strategy to protect the public. In addition, various federal, state, and local regulatory agencies conduct oversight of vector control activities, which must adhere to current regulations and manufacturer label requirements. Any application of chemical controls would be conducted in full compliance with legal application rates as regulated by the California Department of Pesticide Regulation.

Also, as discussed above in response to Biological Resources – IV(b), the VCP is a current enrollee of the SWRCB NPDES Permit 2016-0039-DWQ, which authorizes vector control application in Waters of the U.S.

While the IVMP would comply with all governing regulations and applicable agencies, for the purpose of this Initial Study impacts could be potentially significant. This will be further analyzed in the PEIR.

- b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Proposed Project includes implementation of the countywide IVMP. As such, individual activities could occur in a wide range of locations and could potentially be located within one-quarter mile of an existing or proposed school. As discussed above in response to Hazards and Hazardous Materials – VIII(a), the VCP strives to safeguard the public's health from West Nile Virus, Zika, and other diseases as well as to minimize harmful effects on the environment by using a risk-analysis approach to control the spread of such diseases. Public communication, education, and transparency of operations are the cornerstones of the VCP's strategy to protect the public. Therefore, this will be further analyzed in the PEIR.

- c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been

subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Proposed Project includes implementation of the countywide IVMP. As such, individual activities could occur in a wide range of locations and could potentially be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances. As discussed above in response to Hazards and Hazardous Materials – VIII(a), for the purpose of this Initial Study impacts could be potentially significant, and this will be further analyzed in the PEIR.

- d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The Proposed Project includes implementation of the countywide IVMP. As such, individual activities could occur in a wide range of locations potentially including within an airport land use planning area or within two miles of a public airport or public use airport where such a plan has not been adopted. However, the Proposed Project would not construct residential or other habitable or commercial structures that would create a safety hazard for people residing or working in the project area. Therefore, no impacts would occur.

- e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The Proposed Project includes implementation of the countywide IVMP. As such, individual activities could occur in a wide range of locations potentially including within the vicinity of a private airstrip. However, the Proposed Project would not construct residential or other habitable or commercial structures that would create a safety hazard for people residing or working in the project area. Therefore, no impacts would occur.

- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

The following sections summarize the Proposed Project's consistency with applicable emergency response plans or emergency evacuation plans.

i. OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

Less than Significant Impact: The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives, and actions for each jurisdiction in San Diego County, including all cities and the County unincorporated areas. The IVMP will not interfere with this plan because it will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

No Impact: Implementation of the countywide IVMP will not interfere with the San Diego County Nuclear Power Station Emergency Response Plan due to the nature of the Proposed Project. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. All land area within 10 miles of the plant is not within the unincorporated jurisdiction of the County and as such a project in the unincorporated area is not expected to interfere with any response or evacuation.

iii. OIL SPILL CONTINGENCY ELEMENT

Less than Significant Impact: The Proposed Project includes implementation of the countywide IVMP. As such, individual activities could occur in a wide range of locations and could potentially be located within the coastal zone or coastline. However, the intent of the proposed IVMP is to reduce the spread of mosquito-borne and other vector-borne disease, and will not prevent the goals and objectives from the Oil Spill Contingency Element from being implemented.

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

No Impact: The Emergency Water Contingencies Annex and Energy Shortage Response Plan will not be interfered with because the Proposed Project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.

v. DAM EVACUATION PLAN

Less than Significant Impact: The Proposed Project includes implementation of the countywide IVMP. As such, individual activities could occur in a wide range of locations and could potentially be located within a Dam Inundation Area. However, the intent of the proposed IVMP is to reduce the spread of mosquito-borne and other vector-borne disease, and will not prevent the goals and objectives from Dam Evacuations Plans from being implemented. Since the IVMP will not construct unique institutions in a dam inundation zone, the Proposed Project will not impair implementation of or physically interfere with the implementation of an emergency response plan.

- g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

No Impact: The IVMP will not expose people or structures to a significant risk of loss, injury, or death involving wildland fires because individual activities would not involve the construction of habitable buildings or structures.

- h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

No Impact: The proposed IVMP includes a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne disease. This would also include public outreach and education in communities across San Diego County. The IVMP would not propose a use, or place residents adjacent to an existing or reasonably foreseeable use, that would substantially increase current or future resident's exposure to vectors.

IX. HYDROLOGY AND WATER QUALITY -- Would the project:

- a) Violate any waste discharge requirements?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Potentially Significant Impact: All proposed IVMP activities would comply with applicable federal, state, and local regulations. As discussed above in response to Biological Resources – IV(b), the VCP is a current enrollee of the SWRCB NPDES Permit 2016-0039-DWQ, which authorizes vector control application in Waters of the U.S. The proposed IVMP's compliance with waste discharge requirements will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

- b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The Proposed Project includes implementation of the countywide IVMP with the intent to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. As such, individual activities could occur in a wide range of locations and could potentially be located near an impaired water body as listed on the Clean Water Act Section 303(d) list. Therefore, the potential for the Proposed Project to result in an increase in any pollutant for which the water body is already impaired will be further analyzed in the PEIR.

- c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Among other activities, the proposed IVMP would include physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne disease and nuisances. The implementation of these control methods could potentially cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. Therefore, this will be further analyzed in the PEIR as potentially significant.

- d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Among other activities, the proposed IVMP would include physical control methods; however these activities are not expected to result in the depletion of groundwater supplies or interference with groundwater recharge. Individual activities are not expected to result in increased surface runoff as they will not increase the amount of impervious areas (which will reduce recharge). The use of groundwater is not proposed as a component of the IVMP. As such, no impacts are anticipated.

- e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Among other activities, the proposed IVMP would include physical control methods. This could potentially include, but not be limited to, removal of vegetation or sediment, interruption of water flow, rotation of stored water, pumping and/or filling sources, improving drainage and water circulation systems, and installing, removing, or improving culverts, tide gates, and other water control structures. These activities could potentially alter the existing drainage pattern of a site or area, which could affect erosion or siltation on- or off-site. Therefore, the potential for the IVMP to substantially alter the existing drainage pattern of a site will be further discussed in the PEIR.

- f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: As discussed above in response to Hydrology and Water Quality – IX(e), the proposed IVMP would include physical control methods. This could potentially include, but not be limited to, removal of vegetation or sediment, interruption of water flow, rotation of stored water, pumping and/or filling sources, improving drainage and water circulation systems, and installing, removing, or improving culverts, tide gates, and other water control structures. These activities could potentially alter the existing drainage pattern of a site or area, which could increase the rate or amount of surface runoff in a manner which could result in flooding on- or off-site. Therefore, the potential for the IVMP to substantially alter the existing drainage pattern of a site will be further discussed in the PEIR.

- g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The IVMP does not propose to create or contribute runoff water that will exceed the capacity of existing or planned storm water drainage systems. Therefore, impacts will be less than significant.

- h) Provide substantial additional sources of polluted runoff?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The IVMP does not propose to construct any structures, facilities, or services that would result in new or additional sources of runoff. In addition, among other activities the proposed IVMP would include chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. This may include, but not be limited to, insecticides, pesticides, and herbicide. As such, various federal, state, and local agencies conduct oversight over vector control activities, and all activities must adhere to certain regulations and manufacturer label requirements. Any application of chemical controls would be conducted in full compliance with legal application rates as regulated by the California Department of Pesticide Regulation. Therefore, impacts would be less than significant.

- i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

No Impact: The Proposed Project includes implementation of the countywide IVMP with the intent to reduce the spread of mosquito-borne and other vector-borne disease. The IVMP activities would not include the construction of housing or other habitable structures. Therefore, no impacts will occur.

- j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

<input checked="" type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Potentially Significant Impact: While housing and habitable structures will not be proposed under the IVMP, water control structures or other facilities, such as water circulation systems, culverts, or tide gates, could be proposed and could potentially be placed within a 100-year flood hazard area. Therefore, the potential for IVMP activities to impede or redirect flood flows through placement within a 100-year flood hazard area will be further discussed in the PEIR.

- k) Expose people or structures to a significant risk of loss, injury or death involving flooding?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Less than Significant Impact: The IVMP does not propose construction of housing or habitable structures; therefore, the Proposed Project will not expose people to a significant risk of loss, injury or death. Also, water circulation techniques (such as water control structures) may be included in the IVMP as discussed above in response to Hydrology and Water Quality - IX(f). However, the installation of such facilities are not anticipated to expose people or structures to a significant risk of loss, injury or death. This will be further analyzed in the PEIR.

- l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: As discussed above in response to Hydrology and Water Quality – IX(k), although individual IVMP activities could be located within dam inundation areas, activities will not include the construction of habitable buildings or structures that will be susceptible to flooding as a result of the failure of a dam or levee. Therefore, impacts will be less than significant.

- m) Inundation by seiche, tsunami, or mudflow?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

i. SEICHE

No Impact: The Proposed Project includes implementation of the countywide IVMP with the intent to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. As such, individual activities could occur in a wide range of locations and could potentially be located along the shore of a lake or a reservoir subject to seiche. However, the IVMP will not result in the construction of habitable structures that will place people at risk or harm if a seiche event were to occur. Therefore, no impacts will occur.

ii. TSUNAMI

No Impact: The Proposed Project includes implementation of the countywide IVMP, and as such, individual activities could occur in a wide range of locations potentially including within a mile of the coast. However, the IVMP will not result in the construction of habitable structures that will place people at risk or harm if a tsunami event were to occur. Therefore, no impacts will occur.

iii. MUDFLOW

No Impact: The Proposed Project includes implementation of the countywide IVMP, and as such, individual activities could occur in a wide range of locations potentially including within a landslide susceptibility zone. However, the IVMP will not result in the construction of habitable structures that will place people at risk or harm if a mudflow event were to occur. Therefore, no impacts will occur.

X. LAND USE AND PLANNING -- Would the project:

- a) Physically divide an established community?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation | <input checked="" type="checkbox"/> No Impact |

Incorporated

Discussion/Explanation:

No Impact: The Proposed Project would not introduce new infrastructure such as major roadways, water supply systems, or utilities to the area. Therefore, the Proposed Project will not significantly disrupt or divide the established community.

- b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation | <input checked="" type="checkbox"/> No Impact |
| <input type="checkbox"/> Incorporated | |

Discussion/Explanation:

No Impact: The Proposed Project includes implementation of the countywide IVMP with the intent to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. It includes a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne disease. This would also include public outreach and education in communities across San Diego County. These activities would not alter the type of land use nor interfere with existing land uses, and therefore, would be consistent and not conflict with local land use plans or regulations.

XI. MINERAL RESOURCES -- Would the project:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

- | | |
|--|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation | <input type="checkbox"/> No Impact |
| <input type="checkbox"/> Incorporated | |

Discussion/Explanation:

Less than Significant Impact: The Proposed Project includes implementation of the countywide IVMP. As such, individual activities could occur in a wide range of locations and could potentially be located on lands designated MRZ-2 by the California Department of Conservation Division of Mines and Geology. MRZ-2 is defined as an area where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presents exist. However, the intent of the proposed IVMP is to reduce the spread of mosquito-borne and other vector-borne disease. Therefore, while it is possible that IVMP activities may include physical control methods such as minor grading or vegetation management, it would not include significant earthwork or other activities that would result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state. Furthermore, the IVMP would not result in the redesignation of existing land uses or zoning regulations, nor would it preclude future mining activities. Therefore, impacts will be less than significant.

- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: As discussed above, the Proposed Project includes implementation of the countywide IVMP. Individual activities could occur in a wide range of locations and could potentially be located on lands designated MRZ-2 by the California Department of Conservation Division of Mines and Geology. While it is possible that IVMP activities may include physical control methods such as minor grading or vegetation management, it would not include significant earthwork or other activities that would result in the loss of availability of a known mineral resource that will locally important. Furthermore, the IVMP would not result in the redesignation of existing land uses or zoning regulations, nor would it preclude future mining activities. Therefore, impacts will be less than significant.

XII. NOISE -- Would the project result in:

- a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: Among other activities, the proposed IVMP would include physical and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. As a result, temporary short-term noise sources may expose people to potentially significant noise levels that exceed the allowable limits of the applicable noise ordinance and/or General Plan Noise Element, depending on the distance of activities to sensitive receptors. Noise sources could potentially include, but not be limited to, truck- or trailer-mounted gas-powered sprayers used for pesticide application, gas-powered backpack and hand-held application equipment, and other motorized vehicles (e.g., aircraft, watercraft). Therefore, noise impacts will be further discussed in the PEIR.

- b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Activities proposed under the IVMP will not propose any of the following land uses that can be impacted by groundborne vibration or groundborne noise levels.

1. Buildings where low ambient vibration is essential for interior operation, including research and manufacturing facilities with special vibration constraints.

2. Residences and buildings where people normally sleep including hotels, hospitals, residences and where low ambient vibration is preferred.
3. Civic and institutional land uses including schools, churches, libraries, other institutions, and quiet office where low ambient vibration is preferred.
4. Concert halls for symphonies or other special use facilities where low ambient vibration is preferred.

Also, IVMP activities will not propose any major, new, or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area.

- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: Among other activities, the proposed IVMP would include physical and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. As discussed above, temporary short-term noise sources may expose people to potentially significant noise levels; however, no activities are proposed that are anticipated to result in a substantial permanent increase in ambient noise levels.

- d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: See response to Noise – XII(a) and (c) above. Individual activities would include implementation of physical or chemical control methods that could potentially generate periodic increases in ambient noise levels in the vicinity of an individual site. Therefore, the potential noise impacts will be further addressed in the PEIR.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The Proposed Project does not propose to construct residential or other habitable or commercial structures. The Proposed Project includes implementation of the countywide IVMP. As such, individual activities could occur in a wide range of locations and could

potentially be located within an airport land use plan area or within two miles of a public airport or public use airport. However, based on the temporary nature of proposed IVMP activities, the Proposed Project would not expose people residing or working in the project areas to excessive noise levels.

- f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: See response to Noise – XII(e) above. Because the Proposed Project includes implementation of the countywide IVMP, individual activities could occur in a wide range of locations and could potentially be located within the vicinity of a private airstrip. However, based on the temporary nature of proposed IVMP activities, the Proposed Project would not expose people residing or working in the project areas to excessive noise levels.

XIII. POPULATION AND HOUSING -- Would the project:

- a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The intent of the proposed IVMP is to reduce the spread of mosquito-borne and other vector-borne disease. Individual activities under IVMP will not induce substantial population growth because they will not propose any physical or regulatory change that would involve removing a restriction to or encouraging population growth in an area including, but limited to the following: new or extended infrastructure or public facilities; new commercial or industrial facilities; large-scale residential development; accelerated conversion of homes to commercial or multi-family use; or regulatory changes including General Plan amendments, specific plan amendments, zone reclassifications, sewer or water annexations; or Local Agency Formation Commission annexation actions. Therefore, no impacts will occur.

- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed IVMP includes a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. This would also include

public outreach and education in communities across San Diego County. The IVMP would not include displacement of existing housing. Therefore, no impact will occur.

- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The proposed IVMP includes a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. This would also include public outreach and education in communities across San Diego County. The IVMP would not include displacement of people. Therefore, no impact will occur.

XIV. PUBLIC SERVICES

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:
- i. Fire protection?
 - ii. Police protection?
 - iii. Schools?
 - iv. Parks?
 - v. Other public facilities?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The intent of the proposed IVMP is to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. Individual activities under IVMP will not include residential components. Therefore, the Proposed Project will not result in the need for the provision of additional governmental facilities, and as such, no impact will occur.

XV. RECREATION

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Individual activities under IVMP will not include any residential use, included but not limited to a residential subdivision, mobile home park, or construction of a single-family residence that may increase the use of existing neighborhood or regional parks or other recreational facilities in the vicinity. Furthermore, the IVMP would not result in any changes to existing land uses that would accelerate or result in the deterioration of recreational facilities. Therefore, no impacts will occur.

- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Individual activities under IVMP will not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impact will occur.

XVI. TRANSPORTATION AND TRAFFIC -- Would the project:

- a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

The County of San Diego Guidelines for Determining Significance for Traffic and Transportation (Guidelines) establish measures of effectiveness for the performance of the circulation system. These Guidelines incorporate standards from the County of San Diego Public Road Standards and Mobility Element, the County of San Diego Transportation Impact Fee Program and the Congestion Management Program.

Less than Significant Impact: The proposed IVMP would include a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. This would also include public outreach and education in communities across San Diego County. As a result, light truck and automobile trips would be required to transport workers, materials, and equipment. These trips would be consistent with present traffic operation levels and not result in a substantial change in vehicle use over existing conditions. Although impacts are anticipated to be less than significant, this will be further discussed in the PEIR.

- b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

The designated congestion management agency for the San Diego region is SANDAG. SANDAG is responsible for preparing the RTP of which the Congestion Management Program (CMP) is an element to monitor transportation system performance, develop programs to address near- and long-term congestion, and better integrate land use and transportation planning decisions. The CMP includes a requirement for enhanced CEQA review applicable to certain large developments that generate an equivalent of 2,400 or more average daily vehicle trips or 200 or more peak hour vehicle trips. These large projects must complete a traffic analysis that identifies the project's impacts on CMP system roadways, their associated costs, and identify appropriate mitigation. Early project coordination with affected public agencies, the Metropolitan Transit System and the North County Transit District is required to ensure that the impacts of new development on CMP transit performance measures are identified.

Less than Significant Impact: As discussed above, the proposed IVMP would include the ongoing and continued use of light truck and automobile trips to transport workers, materials, and equipment through San Diego County. Individual activities under IVMP would result in ongoing vehicle trips; however, trips associated with existing VCP activities have occurred since the VCP inception in 1989. Therefore, existing vehicle trips are considered part of the IVMP's baseline conditions as existing operations, and the proposed IVMP is not expected to substantially increase trips that would conflict with an applicable congestion management program.

- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: The main compatibility concerns for the protection of airport airspace are related to airspace obstructions (building height, antennas, etc.) and hazards to flight (wildlife attractants, distracting lighting or glare, etc.). Because the Proposed Project includes implementation of the countywide IVMP throughout San Diego County, individual activities could potentially be located within an Airport Influence Area or within two miles of a public airport. However, the IVMP does not propose installation of structures that would contribute to or directly result in the obstruction of airspace resulting in a change to air traffic patterns. Therefore, the Proposed Project would result in less than significant impacts on air traffic patterns.

In addition, the proposed IVMP would include countywide surveillance and chemical control methods to monitor and reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. As a result, this could include the use of aircraft. During the peak mosquito breeding season (April – October), aerial applications may occur routinely based on VCP surveillance and observations. However, because aircraft operations typically do not occur during off-peak mosquito season, and are infrequent during peak mosquito season, the proposed IVMP is not anticipated to result in a change in air traffic patterns. All aircraft operations would be conducted in accordance with established air traffic patterns. Therefore, the Proposed Project would result in less than significant impacts on air traffic patterns.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Individual activities under IVMP will not alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create or place curves, slopes or walls which impede adequate site distance on a road. Therefore, no impact would result.

e) Result in inadequate emergency access?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The intent of the proposed IVMP is to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. Individual activities under IVMP are not anticipated to include the construction of new structures or facilities that would interfere or otherwise affect existing emergency access. Therefore, no impacts would result from implementation of the IVMP.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The intent of the proposed IVMP is to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. Individual activities under IVMP are not anticipated to include the construction of new structures or facilities that would interfere with the provisions of public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Therefore, no impact would result from implementation of the IVMP.

XVII. TRIBAL CULTURAL RESOURCES -- Would the project:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k), or

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: As discussed above in response to Cultural Resources – V(b), the proposed IVMP would include physical control methods for the purpose of monitoring and abatement to improve water circulation in aquatic habitats. This could potentially include, but not be limited to, removal of vegetation or sediment, interruption of water flow, rotation of stored water, pumping and/or filling sources, improving drainage and water circulation systems, and installing, removing, or improving culverts, tide gates, and other water control structures. As a result, these activities have the potential to result in a substantial adverse change in the significance of a tribal cultural resource, including sites that are listed or eligible for listing in the California or local Register of Historical Resources. However, any potential impacts to tribal cultural resources would be avoided or minimized to the extent feasible, and would be mitigated in accordance with applicable requirements. This will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: As discussed above in response to Cultural Resources – V(b), the proposed IVMP would include physical control methods for the purpose of monitoring and abatement to improve water circulation in aquatic habitats. This could potentially include, but not be limited to, removal of vegetation or sediment, interruption of water flow, rotation of stored water, pumping and/or filling sources, improving drainage and water circulation systems, and installing, removing, or improving culverts, tide gates, and other water control structures. As a result, these activities have the potential to result in a substantial adverse change in the significance of a tribal cultural resource, including resources determined to be significant pursuant to criteria defined in subdivision (c) of Public Resources Code §5024.1. However, any potential impacts to tribal cultural resources would be avoided or minimized to the extent feasible, and would be mitigated in accordance with applicable requirements. This will be further analyzed in the PEIR; however, for the purpose of this Initial Study impacts could be potentially significant.

XVIII. UTILITIES AND SERVICE SYSTEMS -- Would the project:

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The Proposed Project does not involve any uses that will discharge any wastewater to sanitary sewer or on-site wastewater systems (septic). Therefore, the Proposed Project will not exceed any wastewater treatment requirements.

- b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

No Impact: The intent of the proposed IVMP is to reduce the spread of mosquito-borne and other vector-borne disease. Individual activities proposed under IVMP would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities. Therefore, no impacts will occur.

- c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

<input type="checkbox"/> Potentially Significant Impact	<input checked="" type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less than Significant With Mitigation Incorporated	<input type="checkbox"/> No Impact

Discussion/Explanation:

Less than Significant Impact: Among other activities, the proposed IVMP would include physical control methods. This could potentially include, but not be limited to, removal of vegetation or sediment, interruption of water flow, rotation of stored water, pumping and/or filling sources, improving drainage and water circulation systems, and installing, removing, or improving culverts, tide gates, and other water control structures. However, the Proposed Project itself would not require or result in the construction of new or expanded storm water drainage facilities.

- d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

No Impact: The proposed IVMP includes a range of activities involving surveillance of existing and potential vector threats as well as physical, biological, and chemical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. This would also include public outreach and education in communities across San Diego County. The IVMP would not include development nor propose a use requiring water supplies. As such, no impacts will occur.

- e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

No Impact: As discussed above in Utilities and Services Systems – XVIII(a), the Proposed Project does not involve any uses that will generate or discharge any wastewater to sanitary sewer or on-site wastewater systems (septic). Therefore, the Proposed Project will not require a wastewater treatment provider.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: Among other activities, the proposed IVMP would include physical control methods to reduce the spread of mosquito-borne and other vector-borne diseases and nuisances. As a result, minor grading activities could potentially occur. Specifically, physical control activities may involve minor grading or vegetation management in order to survey and abate vectors and nuisances. As a result, this could potentially generate solid waste. If such activities require solid waste disposal, there are numerous solid waste disposal facilities within San Diego County with remaining capacity. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the DEH, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440 et seq.). Therefore, there is sufficient existing permitted solid waste capacity to accommodate the Proposed Project's solid waste disposal needs.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: Implementation of the IVMP could potentially generate solid waste. All solid waste facilities, including landfills, require solid waste facility permits to operate. In San Diego County, the DEH, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440 et seq.). Individual activities under the IVMP will deposit all solid waste at a permitted solid waste facility and therefore, will comply with federal, state, and local statutes and regulations related to solid waste.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE:

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

- ☒ Potentially Significant Impact
☐ Less than Significant With Mitigation
Incorporated

- ☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Potentially Significant Impact: Per the instructions for evaluating environmental impacts in this Initial Study, the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in sections IV and V of this form. In addition to project-specific impacts, this evaluation considered the projects potential for significant cumulative effects. As a result of this evaluation, the Proposed Project was determined to have **potential significant effects related to biological, cultural, and tribal cultural resources**. While mitigation may be proposed in some instances that reduce these effects to a level below significance, the effectiveness of this mitigation to clearly reduce the impact to a level below significance is unclear. Therefore, this Proposed Project has been determined to potentially meet this Mandatory Finding of Significance.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

- ☒ Potentially Significant Impact
☐ Less than Significant With Mitigation
Incorporated

- ☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

Potentially significant Impact: Per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects was considered in the response to each question in sections I through XVIII of this form. In addition to project-specific impacts, this evaluation considered the Proposed Project's potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there is a **potential for cumulative effects** associated with this Proposed Project. Therefore, cumulative impacts will be further discussed in the PEIR.

- c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

- ☒ Potentially Significant Impact
☐ Less than Significant With Mitigation
Incorporated

- ☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation:

In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in the following eight sections: Aesthetics, Air Quality, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Population and Housing, and Transportation and Traffic. As a result of this evaluation, there were determined to be **potentially significant effects related to Air Quality, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, and Noise**. While mitigation may be proposed in some instances that reduce these significant effects to a level below significance, the

effectiveness of this mitigation to clearly reduce the impact to a level below significance is unclear. Therefore, this Proposed Project has been determined to potentially meet this Mandatory Finding of Significance.

XX. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

All references to Federal, State and local regulation are available on the Internet. For Federal regulation refer to <http://www4.law.cornell.edu/uscode/>. For State regulation refer to www.leginfo.ca.gov. For County regulation refer to www.amlegal.com. All other references are available upon request.

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